

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

OPENAI INC., *et al.*,

Defendants.

No. 1:23-cv-11195-SHS-OTW  
No. 1:24-cv-03285-SHS-OTW  
No. 1:24-cv-04872-SHS-OTW

**DECLARATION OF  
ALLISON S. BLANCO IN  
SUPPORT OF MOTION TO  
ADMIT COUNSEL  
PRO HAC VICE**

DAILY NEWS, *et al.*,

Plaintiffs,

v.

MICROSOFT CORPORATION, *et al.*,

Defendants.

THE CENTER FOR INVESTIGATIVE  
REPORTING, INC.,

Plaintiff,

v.

OPENAI, INC., *et al.*,

Defendants.

ALLISON S. BLANCO, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

1. I am counsel at the law firm of Latham & Watkins LLP.
2. I submit this declaration in support of my Motion to Admit Counsel *pro hac vice* in the above-captioned matter.

3. I have been a member in good standing of the Bar of the State of California since December 11, 2012.

4. I attach a Certificate of Good Standing from the State of California, which was issued within thirty days of this filing, as **Exhibit A** to my Motion to Admit Counsel *pro hac vice*.

5. I have never been convicted of a felony or been the subject of any criminal conviction.

6. I have never been censured, suspended, disbarred or denied admission or readmission by any court.

7. I have never been the subject of a disciplinary sanction and there are no disciplinary proceedings presently pending against me.

Wherefore your declarant respectfully submits that she be permitted to appear as counsel *pro hac vice* in this one case on behalf of Defendants OpenAI, Inc., OpenAI LP, OpenAI GP, LLC, OpenAI LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation LLC, and OpenAI Holdings LLC, (together, “OpenAI”).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 27, 2025

/s/ Allison S. Blanco  
Allison S. Blanco